Annual Index

1978

Each article appearing in TAXES during 1978 is indexed below according to title and author (or authors). In addition, most of the articles have been listed under an appropriate general subject heading and Code sections.

A

Accelerated Depreciation v. the Minimum Tax. Sept., p. 530.

Accounting procedures
Tax return preparation from the perspective of the accountant and the lawyer. Dec., p. 726.

Accumulated earnings tax controversies...July, p. 395.

Acker, Frederick G.—Taking Stock of Estate Planning in the Light of the 1976 TRA. Dec., p. 753.

Activity, Profit, and Section 183. Mar., p. 155.

Adjustments and Allocations of Basis of Stock Dispositions Deemed Essentially Equivalent to Dividends Under Sections 302 and 306. May, p. 288.

AILJ Reborn Again, The! Recycling the Reform. Feb., p. 67.

Allen, John T.—Washington Saves the Farm? The Peculiar Remedy of IRC Section 2032A. Apr., p. 205.

Amortization Shelters in Books, Records, Artwork, and Similar Property—Mirage or Oasis in the Tax Shelter Desert? Nov., p. 695.

Another Guideline to the Role of Form in the Taxation of Corporate Transactions. Mar., p. 160.

Anticipatory Sales of Future Income—When Includible in Income? Oct., p. 608.

Appeal services
Thoughts for a single level of appeal. May, p. 267.

Applying Fair Market Value Appraisal Techniques to Closely Held Preferred Stock. Feb., p. 108.

Are All Silver Transactions Created Equal? An Analysis of Revenue Ruling 77-185. Jan., p. 3.

Armantrout
Another view. July, p. 379.
Educational benefit trust as a lesson in taxation. Oct., p. 600.
First case. May, p. 255.

Ascertainable Standards, Discretionary Powers, and Charitable Remainders. Feb., p. 78.

Asman, Mark F. and John O. Everett—Contemplation of Death and Transferee Liability: 1976 Tax Reform Act Creates a Trap for the Unwary. Sept., p. 535.

Asset acquisition and transfers
Contract failing to allocate purchase price. Mar., p. 143.
Declaratory judgment procedure under IRC Sec. 7477. Oct., p. 635.

Auster, Rolf—The Taxation of Corporate Issuers of Warrants. Apr., p. 213.

Avoiding Disallowed Interest Deduction for Taxpayer Holding Tax-Exempt Bonds. Apr., p. 230.

B

Baird, Charles W. and Philip P. Storrer—Tax Reform and a Proposal—The Value Added Tax. Oct., p. 629.

Banham, Richard L. and John L. Kramer—Partnership Guaranteed Payments: A Complicated Method for Providing Partners with Additional Compensation. May, p. 299.

Bankruptcy Act...Apr., p. 200.

Barbakoff, Lee R. and Robert L. Sabin—Are All Silver Transactions Created Equal? An Analysis of Revenue Ruling 77-185. Jan., p. 3.

Bargain sales to charities...Feb., p. 101.

Battle for Information, The: Strategies of Taxpayers and the Internal Revenue Service to Compel (or Resist) Disclosure. Dec., p. 740.

Berger, Stewart J.—Tax or Penalty? Dischargeable in Bankruptcy?—Apr., p. 220.

Berning, Larry D.—Income Tax Events Triggered by Death: An Examination of Selected Problems. Dec., p. 775.

Black Lung Benefits Revenue Act of 1977...May, p. 251.

Blackman, Dennis and James M. Hopkins—Individual Retirement Arrangements—Planning and Problems. Mar., p. 149.

Blum, Walter J.—The Educational Benefit Trust as a Lesson in Taxation.—Oct., p. 600.

Blum, Walter J. and Willard H. Pedrick—The AILJ Reborn Again! Recycling the Reform. Feb., p. 67.

Boler, James F.—New Tax Court Case Applies Step-Transaction Doctrine to Real Estate Exchange: Impact on Nonsimultaneous Exchanges. Nov., p. 666.

Boyd, James H. and Mary Jane Boyd—Lump-Sum Distributions May Not Always Be Eligible for Ten-Year Forward Averaging: An Analysis of Recent Decisions. Jan., p. 37.

Boyd, Joseph and Paul Streer—Employee or Independent Contractor? Proposed Guidelines May Lessen the Controversy. Aug., p. 489.

Boyd, Mary Jane and James H. Boyd—Lump-Sum Distributions May Not Always Be Eligible for Ten-Year Forward Averaging: An Analysis of Recent Decisions. Jan., p. 37.

Brogdon, William Jack and Ted L. Fisher—Accelerated Depreciation v. the Minimum Tax. Sept., p. 530.

Brooks, Raymond D. and David F. Rock—ESOP May Facilitate Tax-Free Transfer of Interest in Closely Held Corporations. Jan., p. 43.

Brother-Sister Controlled Corporations: On and Off the Road to the Supreme Court with an Edsel. Aug., p. 475.

Bugg, Bruce and William R. Wines—The IRS Should Eliminate the Penalty Tax Often Required for Delaying a Decision to File a Consolidated Return. July, p. 384.

Business forms
Characterization of income flows. Oct., p. 587.

Business planning
A case against business equipment immediate expensing. Apr., p. 236.
Purchase and sale of business assets. Mar., p. 143.
Selection of form of business or professional organization. Dec., p. 880.

C

Case Against the Immediate Expensing of Business Equipment for Tax Purposes, A. Apr., p. 236.

Charitable Bargain Sales and the Allowability Test—A Tax Trap. Feb., p. 101.

Charitable contributions
The allowability test. Feb., p. 101.
How to avoid disallowance. Sept., p. 521.
Is it both a charitable gift and an assignment of income? Feb., p. 116.
Lobbying by public charities. Aug., p. 449.

Clark, Betty Jane—New Temporary Section 367 Regulations. July, p. 405.

Classification of employee or independent contractor...Aug., p. 489.

Cleary, Thomas M.—The Section 691(c) Deduction After the 1976 Tax Reform Act. May, p. 283.

Closely held corporations
Brother-sister controlled corporations. Aug., p. 475.
ESOP may facilitate tax-free transfer of interest. Jan., p. 43.
Planning for shareholders. Dec., p. 897.

Closely held preferred securities
Applying fair market value. Feb., p. 108.

Compensating the General Partner: The *Pratt* Case. Jan., p. 10.

Concept of Reimbursement of Attorney Fees in Tax Cases, The —Its Past, Present and Future. Sept., p. 507.

Contemplation of Death and Transferee Liability: 1976 Tax Reform Act Creates a Trap for the Unwary. Sept., p. 535.

Converting Preferred Stock: What Happens? Oct., p. 604.

Corman, Robert S. and Alan L. Sussman—A Personal Holding Company as an Estate Planning Technique. Nov., p. 679.

Corporate transactions
Brother-sister controlled corporations. Aug., p. 475.
Charitable gift and assignment of income in liquidations. Feb., p. 116.
Continuity-of-interest principles. Dec., p. 904.
Guidelines. Mar., p. 160.
Picking and choosing among subsidiaries. Dec., p. 858.
Planning for closely held corporations and their shareholders. Dec., p. 897.
Section 358(d) and the cash basis taxpayer. Sept., p. 555.
Type F reorganization. Mar., p. 163.

Cowan, Martin B.—Compensating the General Partner: The *Pratt* Case. Jan., p. 10.

Criminal restitution payments...July, p. 420.

Crumbley, D. Larry and Herbert L. Jensen—A Type F Reorganization May Be Valuable. Mar., p. 163.

Crumbley, D. Larry and Kenneth N. Orbach—Inequitable Treatment of Section 652(b) and Reg. Sec. 1.651(b)-1. Aug., p. 470.

D

Dan, Merwyn E.—An Updated Analysis of Tax Planning for Closely Held Corporations and Their Shareholders. Dec., p. 897.

Daniels, James E. and Gale E. Newell—The Effect of the Social Security Act of 1977 on University Payroll Costs and Pension Contributions. Oct., p. 643.

Davies, Jonathan J. and Sam A. Hicks—The Itemized Deductions of Homeowners—An Analysis of the Need for Tax Reform. Jan., p. 22.

Davis Decision May Increase Flexibility in Replacing Involuntarily Converted Real Property. May, p. 272.

Davison, Dale L. and Edward Thomson—The Fifth Circuit Breathes Life into Section 534. July, p. 395.

Death tax
Death and transferee liability. Sept., p. 535.
Problems triggered by death. Dec., p. 775.

Declaratory Judgment Procedure Under IRC Section 7477. Oct., p. 635.

Deductibility of lobbying expenses
Section 162(e)(2)(B). Sept., p. 516.

Deductions of Reserves by Accrual Basis Taxpayers. Feb., p. 93.

Deferred income
Annuities since ERISA. Nov., p. 708.
Evaluation of deferred compensation plans. Dec., p. 787.
IRAs—planning and problems. Mar., p. 149.
Proposed Reg. Sec. 1.61-16. May, p. 243.

Depreciation
Liquidating a subsidiary recently acquired by purchase. Dec., p. 858.

Designing a Qualified Group Legal Services Plan. Mar., p. 123.

Designing Fringe Benefit Packages for Executives. Dec., p. 794.

Diness, David M.—Practitioner's Note: Sec. 355 Separation of Businesses. Jan., p. 27.

Disclosure of information
Positions of taxpayers and the IRS. Dec., p. 740.

Disincentivization of America, The. Aug., p. 496.

District Conference, The—Can It Be Saved and Is It Worth Saving? Aug., p. 498.

Don't Look a Gift Horse in the Mouth, or How to Avoid the Disallowance of a Charitable Contribution. Sept., p. 521.

Dorgan, Byron L.—The Progressive Land Tax—A Discussion. Sept., p. 546.

Dychala, Benjamin J., Jr.—Anticipatory Sales of Future Income—When Includible in Income? Oct., p. 608.

E

Educational Benefit Trust as a Lesson in Taxation, The. Oct., p. 600.

Educational Benefit Trusts—Another View. July, p. 379.

Effect of the Social Security Act of 1977 on University Payroll Costs and Pension Contributions, The. Oct., p. 643.

Employee benefit plans
Designing a group legal services plan. Mar., p. 123.
ESOP may facilitate tax-free transfer of interest in closely held corporations. Jan., p. 43.
Lump-sum distributions. Jan., p. 37.
Tax deferred annuities since ERISA. Nov., p. 708.

Employee or Independent Contractor? Proposed Guidelines May Lessen the Controversy. Aug., p. 489.

Englebrecht, Ted D. and Richard W. Hutchins—Percentage Depletion Deductions for Oil and Gas Operations: A Review and Analysis. Jan., p. 48.

Englebrecht, Ted D. and Samuel L. Lett—Adjustments and Allocations of Basis of Stock Dispositions Deemed Essentially Equivalent to Dividends Under Sections 302 and 306. May, p. 288.

Epsteen, Ralph H.—Incorporating the Professional Practice—Aspects of Terminations, Split-Ups and Mergers. Aug., p. 442.

Erickson, Robert S. and John J. Weiler—Purchase and Sale of Business Assets: Contract Failing to Allocate Purchase Price. Mar., p. 143.

ERISA
Effect on rules for taxing lump-sum distributions. Jan., p. 37.
Tax deferred annuities since ERISA. Nov., p. 708.

ESOP May Facilitate Tax-Free Transfer of Interest in Closely Held Corporations. Jan., p. 43.

Estate planning
Considerations in pre- and post-death planning. Dec., p. 775.
Contemplation of death and transferee liability. Sept., p. 535.
Effect of Tax Reform Act of 1976. Dec., p. 753.
"Gift and leaseback" in tax planning for the professional. Apr., p. 195.
Lifetime gifts. Aug., p. 435.
Personal holding company. Nov., p. 679.
Recycling the reform. Feb., p. 67.
Sec. 2032A and the farm situation. Apr., p. 205.
Trade-offs. Dec., p. 766.
Use of intrafamily loan. July, p. 389.

Evaluation of Deferred Compensation Plans, An. Dec., p. 787.

Everett, John O. and Mark F. Asman—Contemplation of Death and Transferee Liability: 1976 Tax Reform Act Creates a Trap for the Unwary. Sept., p. 535.

Excess business holdings tax...Oct., p. 647.

Exchanging Like-Kind Property Under Section 1031. Oct., p. 594.

Existing Tax Shelters: Is It Possible to Cope? Dec., p. 822.

F

Farmland tax
Farmers' estate tax. Apr., p. 205.
Progressive land tax. Sept., p. 546.

Federal use tax classifications...July, p. 427.

Fifth Circuit Breathes Life into Section 534, The. July, p. 395.

Fifth Circuit Reaffirms Distaste for IRS Misrepresentation. Jan., p. 28.

Financial and Tax Aspects of Planning for Foreign Currency Exchange Rate Fluctuations. Mar., p. 131.

Financing business property
Sale-leasebacks and the shelter-oriented investor. Oct., p. 618.

Fink, Philip R.—Optional Basis Adjustments to Partnership Property—Pitfalls and Tax Planning. May, p. 276.

Fink, Philip R.—Selecting a Form of Business Predicated on Characterization of Income Flows. Oct., p. 587.

First Educational Benefit Trust Case, The—Expedience over Principle. May, p. 255.

Fisher, Ted L. and William Jack Brogdon—Accelerated Depreciation v. the Minimum Tax. Sept., p. 530.

Fisherman and His Net, The—A Short, Short Story by C. P. Angler. Feb., p. 115.

Flannery, Harry A.—The Utility Truck-Pintle Hook Dilemma—Federal Use Tax Classifications: "Single-Unit" v. "Truck-Trailer Combination". July, p. 427.

Fones, William H. D., Jr. and Lewis D. Solomon—Sale-Leasebacks and the Shelter-Oriented Investor: An Analysis of *Frank Lyon Co.* and *Est. of Franklin*. Oct., p. 618.

For Foundations with Excess Holdings: A Roadmap to Meet Stock Disposition Requirements. Oct., p. 647.

Foreign currency exchange rate fluctuations...Mar., p. 131.

Foreign Earned Income Exclusion, The—Death Blow or Recovery? Mar., p. 169.

Foreign taxation
Earned income exclusion. Mar., p. 169.
Interest, taxes, and doing business abroad. Nov. p. 703.
Maximizing foreign credit benefits. Aug., p. 462.
New temporary Section 367 regulations. July, p. 405.
Restructuring foreign operations in light of the repeal of the minimum distribution rule and other changes. Feb., p. 83.

Fringe benefit plans
How to design fringe benefit packages for executives in today's atmosphere. Dec., p. 794.

From the Thoughful Tax Advisor. May, p. 265; June, p. 326; July, p. 389; Sept., p. 528; Nov., p. 687.

G

Gallagher, Michael C.—Wraparound Mortgages and Deferred Payment Sales of Real Property. July, p. 400.

Galvin, Paul F.—Investigation and Start-Up Costs: Tax Consequences and Considerations for New Businesses. July, p. 413.

Gift and leaseback arrangement in tax planning for the professional...Apr., p. 195.

Gifts
Contemplation of death and transferee liability. Sept., p. 535.

Gilleran, Robert T.—Amortization Shelters in Books, Records, Artwork, and Similar Property—Mirage or Oasis in the Tax Shelter Desert? Nov., p. 695.

Go, Stay and Don't Return Today—Ten Years Later! Apr., p. 189.

Grace, J. Peter—The Disincentivization of America. Aug., p. 496.

Grassroots Lobbying Defined: The Scope of IRC Section 162(e)(2)(B). Sept., p. 516.

Hammer, Lawrence H.—Section 341(f): Interpretation and Comment. Sept., p. 541.

Hampson, J. Jay—From the Thoughtful Tax Advisor. July, p. 389.

Harris, Steven M. and Richard E. Warner—Fifth Circuit Reaffirms Distaste for IRS Misrepresentation. Jan., p. 28.

Hicks, Sam A. and Jonathan J. Davies—The Itemized Deductions of Homeowners—An Analysis of the Need for Tax Reform. Jan., p. 22.

Holub, Steven F.; and Paul Ziffren—The Concept of Reimbursement of Attorney Fees in Tax Cases—Its Past, Present and Future. Sept., p. 507.

Home Office Deduction, The: Is It Worth It? Sept., p. 528.

Homeowners expenditure deductions
Analysis of the need for tax reform. Jan., p. 22.

Hopkins, James M. and Dennis Blackman—Individual Retirement Arrangements—Planning and Problems. Mar., p. 149.

Hutchins, Richard W. and Ted D. Englebrecht—Percentage Depletion Deductions for Oil and Gas Operations: A Review and Analysis. Jan., p. 48.

Hutton, William T.—Musings on Continuity of Interest—Recent Developments. Dec., p. 904.

Income averaging
New standard deduction approach. May, p. 265.
Zero bracket approach. Apr., p. 179.

Income reporting
Anticipatory sales of future income. Oct., p. 608.

Income Tax Events Triggered by Death: An Examination of Selected Problems. Dec., p. 775.

Incorporating the Professional Practice—Aspects of Terminations, Split-ups and Mergers. Aug., p. 442.

Incorporation of going business...Sept., p. 555.

Individual Retirement Arrangements—Planning and Problems. Mar., p. 149.

Inequitable Treatment of Section 652(b) and Reg. Sec. 1.651(b)-1. Aug., p. 470.

Installment reporting...July, p. 400.

Interest, Taxes, and Doing Business Abroad. Nov., p. 703.

Internal Revenue Service
Administrative procedures in employee or independent contractor classification situations. Aug., p. 489.
District conference. Aug., p. 498.
Fifth Circuit reaffirms distaste for IRS misrepresentation. Jan., p. 28.
Model profit-sharing and model money purchase pension plans. Nov., p. 673.
Position in disclosure of information. Dec., p. 740.
Thoughts for a single level of appeal. May, p. 267.

IRS Should Eliminate the Penalty Tax Often Required for Delaying a Decision to File a Consolidated Return, The. July, p. 384.

International money market...Mar., p. 131.

Intrafamily loans
Use in estate planning. July, p. 389.

Investigation and Start-Up Costs: Tax Consequences and Considerations for New Businesses. July, p. 413.

Is It Both a Charitable Gift and an Assignment of Income? Feb., p. 116.

Is the Living Gift Really Dead? Aug., p. 435.

Itemized Deductions of Homeowners, The—An Analysis of the Need for Tax Reform. Jan., p. 22.

J

Jarchow, Stephen P.—Converting Preferred Stock: What Happens? Oct., p. 604.

Javaras, George B.—Nonrecourse Debt in Real Estate and Other Investments. Dec., p. 801.

Jensen, Herbert L. and D. Larry Crumbley—A Type F Reorganization May Be Valuable. Mar., p. 163.

Jobs tax credit
Applying the new jobs credit carryback to individuals with multiple pass-through entities. Nov., p. 687.

K

Kahan, Paul R.—Deductions of Reserves by Accrual Basis Taxpayers. Feb., p. 93.

Kanter, Burton W.—Existing Tax Shelters: Is It Possible to Cope? Dec., p. 822.

Kennedy, Richard W.—Ascertainable Standards, Discretionary Powers, and Charitable Remainders. Feb., p. 78.

Kramer, John L. and Richard L. Banham—Partnership Guaranteed Payments: A Complicated Method for Providing Partners with Additional Compensation. May, p. 299.

Krebs, Frederick J.—Grassroots Lobbying Defined: The Scope of IRC Section 162(e)(2)(B). Sept., p. 516.

Kreiser, Larry—A Case Against the Immediate Expensing of Business Equipment for Tax Purposes. Apr., p. 236.

L

Land tax
Progressive land tax. Sept., p. 546.

Lett, Samuel L. and Ted D. Englebrecht—Adjustments and Allocations of Basis of Stock Dispositions Deemed Essentially Equivalent to Dividends Under Sections 302 and 306. May, p. 288.

Levine, Mel—Section 911: The Foreign Earned Income Exclusion—Death Blow or Recovery? Mar., p. 169.

Litigation
Reimbursement of attorney fees in tax cases. Sept., p. 507.
Strategies of taxpayers and the IRS to compel (or resist) disclosure. Dec., p. 740.

Litwin, Gerald H.—Designing a Qualified Group Legal Services Plan. Mar., p. 123.

Lobbying by Public Charities Under the Tax Reform Act of 1976. Aug., p. 449.

Logarithms, Exponents and Carryover Basis. Aug., p. 486.

Lubell, Myron S.—From the Thoughtful Tax Advisor. Sept., p. 528.

Lump-Sum Distributions May Not Always Be Eligible for Ten-Year Forward Averaging: An Analysis of Recent Decisions. Jan., p. 37.

M

Madden, Robert E.—Is the Living Gift Really Dead? Aug., p. 435.

Mann, Phillip L.—Designing Fringe Benefit Packages for Executives. Dec., p. 794.

Marshall, Donald C. and James E. Parker—Zero Bracket Approach Adversely Affects Income Averaging. Apr., p. 179.

Martin, Gerald R. and E. Halsey Sandford—Applying Fair Market Value Appraisal Techniques to Closely Held Preferred Stock. Feb., p. 108.

McGaffey, Jere D.—Tax Aspects of Liquidating a Subsidiary Recently Acquired by Purchase. Dec., p. 858.

Miller, Jay W.—Section 334(b)(2) and the *Smith* Case. Nov., p. 691.

Minimum tax
Accelerated depreciation—when beneficial. Sept., p. 530.

Montgomery, Alan L.—Lobbying by Public Charities Under the Tax Reform Act of 1976. Aug., p. 449.

Musings on Continuity of Interest—Recent Developments. Dec., p. 904.

N

New business start-up and investigation costs...July, p. 413.

New Tax Court Case Applies Step-Transaction Doctrine to Real Estate Exchange: Impact on Nonsimultaneous Exchanges. Nov., p. 666.

New Temporary Section 367 Regulations. July, p. 405.

Newell, Gale E. and James E. Daniels—The Effect of the Social Security Act of 1977 on University Payroll Costs and Pension Contributions. Oct., p. 643.

Newman, Joel S.—Of Time and Up the River: Criminal Restitution and the Annual Accounting System. July, p. 420.

Nonrecourse Debt in Real Estate and Other Investments. Dec., p. 801.

O

O'Connor, John K.—The Selection of the Form of Business or Professional Organization: A Need for Clairvoyance. Dec., p. 880.

Of Time and Up the River: Criminal Restitution and the Annual Accounting System. July, p. 420.

Oil and gas
- Percentage depletion deductions. Jan., p. 48.
- Tax changes effected by the Black Lung Benefits Revenue Act of 1977. May, p. 251.

Optional Basis Adjustments to Partnership Property—Pitfalls and Tax Planning. May, p. 276.

Orbach, Kenneth N. and D. Larry Crumbley—Inequitable Treatment of Section 652(b) and Reg. Sec. 1.651(b)-1. Aug., p. 470.

Overnight rule...Apr., p. 189.

P

Parker, James E. and Donald C. Marshall—Zero Bracket Approach Adversely Affects Income Averaging. Apr., p. 179.

Partnership Guaranteed Payments: A Complicated Method for Providing Partners with Additional Compensation. May, p. 299.

Partnerships
- Compensating the general partner. Jan., p. 10.
- Guaranteed payments. May, p. 299.
- Income tax events triggered by death. Dec., p. 775.
- Optional basis adjustments to partnership property. May, p. 276.
- Selection of the form of business or professional organization. Dec., p. 880.

Payroll tax requirements
- Employee or independent contractor. Aug., p. 489.

Pedrick, Willard H. and Walter J. Blum—The AILJ Reborn Again! Recycling the Reform. Feb., p. 67.

Penalty tax
- Consolidated return. July, p. 384.

Pennell, John S. and Robert S. Stevens—The Professional as a Tax Return Preparer: From the Perspective of the Accountant and the Lawyer. Dec., p. 726.

Pension and profit-sharing plans
- Designing a qualified group legal services plan. Mar., p. 123.
- Incorporating the professional practice. Aug., p. 442.
- IRS model profit-sharing and model money purchase pension plans. Nov., p. 673.

Percentage Depletion Deductions for Oil and Gas Operations: A Review and Analysis. Jan., p. 48.

Personal Holding Company as an Estate Planning Technique, A. Nov., p. 679.

Peterson, John M.—What You Need to Know About the IRS Model Profit-Sharing and Model Money Purchase Pension Plans. Nov., p. 673.

Planning Techniques for Maximizing Foreign Credit Benefits. Aug., p. 462.

Polk, Raemon M.—Financial and Tax Aspects of Planning for Foreign Currency Exchange Rate Fluctuations. Mar., p. 131.

Practitioner's Note: Sec. 355 Separation of Businesses. Jan., p. 27.

Preferred stock
- Appraisal techniques. Feb., p. 108.

Preparation of tax returns
- Effect of 1976 Tax Reform Act. Dec., p. 726.

Price, Brian R.—Exchanging Like-Kind Property Under Section 1031. Oct., p. 594.

Professional corporations
- Terminations, split-ups and mergers. Aug., p. 442.

Professional practice tax planning
- Use of gift and leaseback arrangement. Apr., p. 195.

Professional as a Tax Return Preparer, The: From the Perspective of the Accountant and the Lawyer. Dec., p. 726.

Progressive Land Tax, The—A Discussion. Sept., p. 546.

Property evaluation
- Logarithms, exponents and carryover basis. Aug., p. 486.

Proposed Reg. Sec. 1.61-16: An Example of Administrative Overreaching. May, p. 243.

Purchase and Sale of Business Assets: Contract Failing to Allocate Purchase Price. Mar., p. 143.

Pusker, Henri C.—Activity, Profit, and Section 183. Mar., p. 155.

Pusker, Henri C.—Tax Deferred Annuities Since ERISA. Nov., p. 708.

Pye, Malcolm L.—Interest, Taxes, and Doing Business Abroad. Nov., p. 703.

Q

Qualified group legal services plan...Mar., p. 123.

R

Raabe, William, Jr. and Eugene Willis—Avoiding Disallowed Interest Deductions for Taxpayer Holding Tax-Exempt Bonds. Apr., p. 230.

Real estate
- Nonrecourse debt in real estate and other investments. Dec., p. 801.
- Step-transaction doctrine in real estate exchange. Nov., p. 666.

Replacement property qualification...May, p. 272.

Replin, Stephen D.—Don't Look a Gift Horse in the Mouth, or How to Avoid the Disallowance of a Charitable Contribution. Sept., p. 521.

Resisting Continuing IRS Attacks on the Use of "Gift and Leaseback" in Tax Planning for the Professional. Apr., p. 195.

Restructuring Foreign Operations in Light of the Repeal of the Minimum Distribution Rule and Other Changes. Feb., p. 83.

Retirement plans
- Group legal services plan. Mar., p. 123.
- IRAs—planning and problems. Mar., p. 149.
- Lump-sum distributions. Jan., p. 37.

Revenue Act of 1978
- Effect on tax shelters in books, records, artwork, and similar property. Nov., p. 695.
- Trade-offs in estate planning. Dec., p. 766.

Revenue Ruling 77-185...Jan., p. 3.

Rock, David F. and Raymond D. Brooks—ESOP May Facilitate Tax-Free Transfer of Interest in Closely Held Corporations. Jan., p. 43.

S

Sabin, Robert L. and Lee R. Barbakoff—Are All Silver Transactions Created Equal? An Analysis of Revenue Ruling 77-185. Jan., p. 3.

Sale-Leasebacks and the Shelter-Oriented Investor: An Analysis of *Frank Lyon Co.* and *Est. of Franklin.* Oct., p. 618.

Sale of stock
- Section 341(f) interpretation. Sept., p. 541.

Sandford, E. Halsey and Gerald R. Martin—Applying Fair Market Value Appraisal Techniques to Closely Held Preferred Stock. Feb., p. 108.

Santi, David W.—Declaratory Judgment Procedure Under IRC Section 7477. Oct., p. 635.

Schaffer, Daniel C.—Another Guideline to the Role of Form in the Taxation of Corporate Transactions. Mar., p. 160.

Section 53...Nov., p .687.
Section 120...Mar., p. 123.
Section 162...Apr., p. 189.
Section 162(e)(2)(B)...Sept., p. 516.
Section 170...Feb., p. 101.
Section 172...July, p. 420.
Section 183...Mar., p. 155.
Section 192...May, p. 251.
Section 301...May, p. 288.
Section 302...May, p. 288.
Section 306...May, p. 288; Oct., p. 604.
Section 332...July, p. 405.
Section 337...Feb., p. 116.
Section 351...July, p. 405; Dec., p. 822.
Section 355...July, p. 405; Aug., p. 442.
Section 357(b)...Dec., p. 822.
Section 357(c)...Dec., p. 822.
Section 358(d)...Sept., p. 555.
Section 367...July, p. 405; Oct., p. 635.
Section 453(b)...July, p. 400.
Section 501(c)(21)...May, p. 251.
Section 501(h)...Aug., p. 449.
Section 534...July, p. 395.
Section 613A...Jan., p. 48.
Section 652(b)...Aug., p. 470.
Section 691(c)...May, p. 283.
Section 722...Dec., p. 801.
Section 736...May, p. 299.
Section 752...Dec., p. 801.
Section 754...May, p. 276.

Section 904...Mar., p. 131.
Section 911...Mar., p. 169.
Section 954...Feb., p. 83.
Section 1011(b)...Feb., p. 101.
Section 1017...Dec., p. 801.
Section 1023...Aug., p. 486.
Section 1031...Oct., p. 594; Nov., p. 666.
Section 1033(g)...May, p. 272.
Section 1231...Oct., p. 587.
Section 1341...July, p. 420.
Section 1563(a)(2)...Aug., p. 475.
Section 2032A...Apr., p. 205.
Section 6672...Apr., p. 220.
Section 7477...Oct., p. 635.
Section 334(b)(2) and the *Smith* Case. Nov., p. 691.
Section 341(f): Interpretation and Comment. Sept., p. 541.
Section 358(d) and the Cash Basis Taxpayer. Sept., p. 555.
Section 691(c) Deduction After the 1976 Tax Reform Act, The. May, p. 283.
Selecting a Form of Business Predicated on Characterization of Income Flows. Oct., p. 587.
Selection of the Form of Business or Professional Organization, The: A Need for Clairvoyance. Dec., p. 880.
Self-insurance programs
Deductions of reserves by accrual basis taxpayers. Feb., p. 93.
Shores, David F.—Educational Benefit Trusts—Another View. July, p. 379.
Silver straddle transactions...Jan., p. 3.
Simmons, Frederick L.—Resisting Continuing IRS Attacks on the Use of "Gift and Leaseback" in Tax Planning for the Professional. Apr., p. 195.
Single Factor Sales Formula and the *Moorman Manufacturing Co.* Decision, The—A Backward Step in the Apportionment of Income of Interstate Business. Nov., p. 659.
Sjostrand, Gene O.—Thoughtful Tax Advisor—Why Not Go Back to the Standard Deduction? May, p. 265.
Smith, Jacob—The Fisherman and His Net—A Short, Short Story by C. P. Angler. Feb., p. 115.
Solomon, Kenneth I. and Nancy Weissman—Go, Stay and Don't Return Today—Ten Years Later! Apr., p. 189.
Solomon, Lewis D. and William H. D. Fones, Jr.—Sale-Leasebacks and the Shelter-Oriented Investor: An Analysis of *Frank Lyon Co.* and *Est. of Franklin*. Oct., p. 618.
State taxes
Apportionment of income of interstate business. Nov., p. 659.
Steiner, Bruce D.—Logarithms, Exponents and Carryover Basis. Aug., p. 486.
Steinmann, Fred A. and Eugene Willis—*Davis* Decision May Increase Flexibility in Replacing Involuntarily Converted Real Property. May, p. 272.
Stevens, Robert S. and John S. Pennell—The Professional as a Tax Return Preparer: From the Perspective of the Accountant and the Lawyer. Dec., p. 726.
Stevenson, W. C. and Richard P. Weber—Charitable Bargain Sales and the Allowability Test—A Tax Trap. Feb., p. 101.
Stock conversion
Preferred stock. Oct., p. 604.
Stock disposition
Foundations with excess holdings. Oct., p. 647.
Under Secs. 302 and 306. May, p. 288.
Stock liquidations
Section 334(b)(2) and the *Smith* case. Nov., p. 691.
Storrer, Philip P. and Charles W. Baird—Tax Reform and a Proposal—The Value Added Tax. Oct., p. 629.
Streer, Paul and Joseph Boyd—Employee or Independent Contractor? Proposed Guidelines May Lessen the Controversy. Aug., p. 489.
Sussman, Alan L. and Robert S. Corman—A Personal Holding Company as an Estate Planning Technique. Nov., p. 679.
Sutter, William P.—Trade-Offs in Estate Planning. Dec., p. 766.

T

Taking Stock of Estate Planning in the Light of the 1976 TRA. Dec., p. 753.
Tax Aspects of Liquidating a Subsidiary Recently Acquired by Purchase. Dec., p. 858.
Tax Changes Effected by the Black Lung Benefits Revenue Act of 1977. May, p. 251.
Tax Deferred Annuities Since ERISA. Nov., p. 708.
Tax investigations
Fifth Circuit reaffirms distaste for IRS misrepresentation. Jan., p. 28.
Tax litigation
Reimbursement of attorney fees. Sept., p. 507.
Tax or Penalty? Dischargeable in Bankruptcy? Apr., p. 220.
Tax rate schedules
Why not go back to the standard deduction? May, p. 265.
Zero bracket approach adversely affects income averaging. Apr., p. 179.
Tax Reform Act of 1976
Effect on estate planning. Dec., p. 753.
Effect on tax return preparers. Dec., p. 726.
Lifetime gifts. Aug., p. 435.
Lobbying by public charities. Aug., p. 449.
Recycling the reform—estate and gift tax. Feb., p. 67.
Restructuring foreign operations. Feb., p. 83.
Section 691(c) deduction. May, p. 283.
Sec. 911: Foreign earned income exclusion. Mar., p. 169.
Tax Reform and a Proposal—The Value Added Tax. Oct., p. 629.
Tax shelter issues
Amortization in books, records, artwork, and similar property. Nov., p. 695.
Tax shelters
Nonrecourse debt in real estate and other investments. Dec., p. 801.
Treatment of existing problems associated with various tax shelters. Dec., p. 822.
Tax straddle trading techniques
Silver transactions. Jan., p. 3.
Taxation of Corporate Issuers of Warrants, The. Apr., p. 213.
Taxation of corporate transactions
Role of form. Mar., p. 160.
Tax planning for closely held corporations and their shareholders. Dec., p. 897.
Tax-exempt bonds
Avoiding disallowed interest deduction. Apr., p. 230.
Teschner, Paul A.—The First Educational Benefit Trust Case—Expedience over Principle. May, p. 255.
Thomson, Edward and Dale L. Davison—The Fifth Circuit Breathes Life into Section 534. July, p. 395.
Thoughts for a Single Level of Appeal. May, p. 267.
Trade-offs in Estate Planning. Dec., p. 766.
Travel expenses
"Sleep or rest rule" ten years later. Apr., p. 189.
Treusch, Paul E.—The District Conference—Can It Be Saved and Is It Worth Saving? Aug., p. 498.
Tritt, Clyde E.—An Evaluation of Deferred Compensation Plans. Dec., p. 787.
Truskowski, John B.—Section 358(d) and the Cash Basis Taxpayer. Sept., p. 555.
Trusts
Educational benefit trust. July, p. 379; Oct., p. 600.
First educational benefit trust case. May, p. 255.
Inequitable treatment of Sec. 652(b) and Reg. Sec. 1.651(b)-1. Aug., p. 470.
Tax changes effected by the Black Lung Benefits Revenue Act of 1977. May, p. 251.
Trusts and wills
Ascertainable standards, discretionary powers, and charitable remainders. Feb., p. 78.
Type F. Reorganization May Be Valuable, A. Mar., p. 163.

U

University payroll costs and pension contributions...Oct., p. 643.
Updated Analysis of Tax Planning for Closely Held Corporations and Their Shareholders, An. Dec., p. 897.
Utility Truck-Pintle Hook Dilemma—Federal Use Tax Classifications: "Single-Unit" v. "Truck-Trailer Combination," The. July, p. 427.

V

Value added tax...Oct., p. 629.

W

Wabich, James A.—For Foundations with Excess Holdings: A Roadmap to Meet Stock Disposition Requirements. Oct., p. 647.
Walker, Johnny D.—From the Thoughtful Tax Advisor. Nov., p. 687.
Walter, Douglas H.—The Battle for Information: Stategies of Taxpayers and the Internal Revenue Service to Compel (or Resist) Disclosure. Dec., p. 740.

Walter, Douglas H.—Tax Changes Effected by the Black Lung Benefits Revenue Act of 1977. May, p. 251.

Warner, Richard E. and Steven M. Harris—Fifth Circuit Reaffirms Distaste for IRS Misrepresentation. Jan., p. 28.

Warrant agreement...Apr., p. 213.

Warranty and product liability programs...Feb., p. 93.

Washington Saves the Farm? The Peculiar Remedy of IRC Section 2032A. Apr., p. 205.

Wasserman, Michael G.—Proposed Reg. Sec. 1.61-16: An Example of Administrative Overreaching. May, p. 243.

Weber, Richard P. and W. C. Stevenson—Charitable Bargain Sales and the Allowability Test—A Tax Trap. Feb., p. 101.

Weiler, John J. and Robert S. Erickson—Purchase and Sale of Business Assets: Contract Failing to Allocate Purchase Price. Mar., p. 143.

Welch, William H.—Planning Techniques for Maximizing Foreign Credit Benefits. Aug., p. 462.

Welch, William H.—Restructuring Foreign Operations in Light of the Repeal of the Minimum Distribution Rule and Other Changes. Feb., p. 83.

Weisman, David E.—Brother-Sister Controlled Corporations: On and Off the Road to the Supreme Court with an Edsel. Aug., p. 475.

Weissman, Nancy and Kenneth I. Solomon—Go, Stay and Don't Return Today—Ten Years Later! Apr., p. 189.

What You Need to Know About the IRS Model Profit-Sharing and Model Money Purchase Pension Plans. Nov., p. 673.

Wilkinson, Carl E.—Is It Both a Charitable Gift and an Assignment of Income? Feb., p. 116.

Willis, Eugene and William Raabe, Jr.—Avoiding Disallowed Interest Deduction for Taxpayer Holding Tax-Exempt Bonds. Apr., p. 230.

Willis, Eugene and Fred A. Steinmann—*Davis* Decision May Increase Flexibility in Replacing Involuntarily Converted Real Property. May, p. 272.

Wines, William R. and Bruce Bugg—The IRS Should Eliminate the Penalty Tax Often Required for Delaying a Decision to File a Consolidated Return. July, p. 384.

Wolpe, Frank—Thoughts for a Single Level of Appeal. May, p. 267.

Wraparound Mortgages and Deferred Payment Sales of Real Property. July, p. 400.

Y

Young, J. Nelson—The Single Factor Sales Formula and the *Moorman Manufacturing Co.* Decision—A Backward Step in the Apportionment of Income of Interstate Business. Nov., p. 659.

Z

Zero Bracket Approach Adversely Affects Income Averaging. Apr., p. 179.

Ziffren, Paul and Steven F. Holub—The Concept of Reimbursement of Attorney Fees in Tax Cases—Its Past, Present and Future. Sept., p. 507.

U.S. POSTAL SERVICE

STATEMENT OF OWNERSHIP, MANAGEMENT AND CIRCULATION

(Required by 39 U.S.C. 3685)

1. TITLE OF PUBLICATION	A. PUBLICATION NO.	B. DATE OF FILING
TAXES—The Tax Magazine	5 3 4 6 4 0	OCT. 1, 1978
3. FREQUENCY OF ISSUE	A. NO. OF ISSUES PUBLISHED ANNUALLY	B. ANNUAL SUBSCRIPTION PRICE
MONTHLY	12	$35

4. LOCATION OF KNOWN OFFICE OF PUBLICATION *(Street, City, County, State and ZIP Code) (Not printers)*

4025 W. PETERSON AVE., CHICAGO, COOK, ILLINOIS 60646

5. LOCATION OF THE HEADQUARTERS OR GENERAL BUSINESS OFFICES OF THE PUBLISHERS *(Not printers)*

CHICAGO, ILLINOIS 60646

6. NAMES AND COMPLETE ADDRESSES OF PUBLISHER, EDITOR, AND MANAGING EDITOR

PUBLISHER *(Name and Address)*

COMMERCE CLEARING HOUSE, INC. Chicago, Ill. 60646

EDITOR *(Name and Address)*

Gene O. Sjostrand Chicago, Ill. 60646

MANAGING EDITOR *(Name and Address)*

Daniel L. Newquist Chicago, Ill. 60646

7. OWNER *(If owned by a corporation, its name and address must be stated and also immediately thereunder the names and addresses of stockholders owning or holding 1 percent or more of total amount of stock. If not owned by a corporation, the names and addresses of the individual owners must be given. If owned by a partnership or other unincorporated firm, its name and address, as well as that of each individual must be given.)*

NAME	ADDRESS
Owner: Commerce Clearing House, Inc., Chicago, Ill. 60646. Names and addresses of stockholders owning or holding 1 percent or more of total amount of stock: Carothers and Clark, Wilmington, Del.; Cede & Co., New York, N. Y.; Cudd & Co., New York, N. Y.; Eagle Co., Chicago, Ill.; Eddy & Co., New York, N. Y.; Final & Co., Chicago, Ill.; H. A. Whitten & Co., New York, N. Y.; Hare & Co., New York, N. Y.; Monroe & Co., Chicago, Ill.; The Millbrook Tribute Garden, Inc., Millbrook, N. Y.; Daniel K. Thorne, New York, N. Y.; Oakleigh B. Thorne, New York, N. Y.	

8. KNOWN BONDHOLDERS, MORTGAGEES, AND OTHER SECURITY HOLDERS OWNING OR HOLDING 1 PERCENT OR MORE OF TOTAL AMOUNT OF BONDS, MORTGAGES OR OTHER SECURITIES *(If there are none, so state)*

NAME	ADDRESS
N	N
O	O
N	N
E	E

9. FOR COMPLETION BY NONPROFIT ORGANIZATIONS AUTHORIZED TO MAIL AT SPECIAL RATES *(Section 132.122, PSM)*

The purpose, function, and nonprofit status of this organization and the exempt status for Federal income tax purposes *(Check one)*

☐ HAVE NOT CHANGED DURING PRECEDING 12 MONTHS ☐ HAVE CHANGED DURING PRECEDING 12 MONTHS *(If changed, publisher must submit explanation of change with this statement.)*

10. EXTENT AND NATURE OF CIRCULATION	AVERAGE NO. COPIES EACH ISSUE DURING PRECEDING 12 MONTHS	ACTUAL NO. COPIES OF SINGLE ISSUE PUBLISHED NEAREST TO FILING DATE
A. TOTAL NO. COPIES PRINTED *(Net Press Run)*	9,600	9,000
B. PAID CIRCULATION 1. SALES THROUGH DEALERS AND CARRIERS, STREET VENDORS AND COUNTER SALES	0	0
2. MAIL SUBSCRIPTIONS	8,520	8,425
C. TOTAL PAID CIRCULATION *(Sum of 10B1 and 10B2)*	8,520	8,425
D. FREE DISTRIBUTION BY MAIL, CARRIER OR OTHER MEANS SAMPLES, COMPLIMENTARY, AND OTHER FREE COPIES	178	188
E. TOTAL DISTRIBUTION *(Sum of C and D)*	8,698	8,613
F. COPIES NOT DISTRIBUTED 1. OFFICE USE, LEFT OVER, UNACCOUNTED, SPOILED AFTER PRINTING	902	387
2. RETURNS FROM NEWS AGENTS	0	0
G. TOTAL *(Sum of E, F1 and 2—should equal net press run shown in A)*	9,600	9,000

11. I certify that the statements made by me above are correct and complete. SIGNATURE AND TITLE OF EDITOR, PUBLISHER, BUSINESS MANAGER, OR OWNER: Gene O. Sjostrand, Manager

12. FOR COMPLETION BY PUBLISHERS MAILING AT THE REGULAR RATES *(Section 132.121, Postal Service Manual)*

39 U. S. C. 3626 provides in pertinent part: "No person who would have been entitled to mail matter under former section 4359 of this title shall mail such matter at the rates provided under this subsection unless he files annually with the Postal Service a written request for permission to mail matter at such rates."

In accordance with the provisions of this statute, I hereby request permission to mail the publication named in Item 1 at the phased postage rates presently authorized by 39 U. S. C. 3626.

SIGNATURE AND TITLE OF EDITOR, PUBLISHER, BUSINESS MANAGER, OR OWNER

Gene O. Sjostrand, Manager

PS Form 3526 (Page 1)
Mar. 1977